## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA :

: CRIMINAL ACTION

V.

: 04-10197-MLW

JUAN RIVERA ALVARADO :

## JOINT MOTION TO CONTINUE DETENTION HEARING

The United States of America, by Michael J. Sullivan, United States Attorney, and Nadine Pellegrini, Assistant United States Attorney for the District of Massachusetts, and Charles Rankin, Esq., counsel for the defendant, files this Joint Motion to Continue the Detention Hearing as follows:

- 1. The detention hearing on the above-captioned case was scheduled for and began on July 15, 2004. The hearing was not completed at that session and a continuation of the hearing was scheduled for the afternoon of Monday, July 19, 2004.
- 2. That date and time conflicted with another court appearance for counsel for the government who requested a further continuance until a date and time convenient for the parties.

  Counsel for the defendant agreed that the hearing could be continued. Currently, all parties can be present for the continued hearing on Thursday, July 22, 2004 at 2:00 p.m.
- 3. As the government's motion for detention has required a hearing which is not yet completed, the time from the date of the

motion until the completion should be excluded from speed trial calculations pursuant to 18 U.S.C.  $\S 3161 \ (h)(1)(F)$ .

Respectfully submitted,

For the Defendant:
JUAN RIVERA ALVARADO

MICHAEL J. SULLIVAN United States Attorney

/s/ Charles Rankin, Esq. CHARLES RANKIN, ESQ. Rankin & Sultan One Commercial Wharf North Boston, MA 02110 By: <u>/s/ Nadine Pellegrini</u> NADINE PELLEGRINI Assistant U.S. Attorney